































# EXPLANATION FOR GEOLOGIC MAP

## Geologic Map Units and Symbols

Age	Formation	Map Symbol	Description
Quaternary		Qt 	Travertine
		Qc 	Colluvium
		Qal 	Alluvium
Tertiary	Salt Lake	Tsl 	Salt Lake Formation
	Unconformity		
Jurassic	Nugget Sandstone	Jn 	Nugget Sandstone
Triassic	Thaynes	Trtpu 	Upper Portneuf Limestone Member
		Tral 	Ankareh Formation - Lane Tongue
		Trtpl 	Lower Portneuf Limestone Member
		Trtc 	Thaynes C Member
		Trtb 	Thaynes B Member
		Trta 	Thaynes A Member
	Dinwoody	Trdu 	Upper Dinwoody Formation
	Woodside	Trw 	Woodside Formation
	Dinwoody	Trdl 	Lower Dinwoody Formation
Permian	Phosphoria	Ppc 	Cherty Shale Member
		Ppr 	Rex Chert Member
		Ppm 	Meade Peak Member
Pennsylvanian/Permian	Park City & Wells	Ppwu 	Grandeur Member of Park City Formation and Upper Wells Formation
	Wells	Ppwl 	Lower Wells Formation

## Geologic Map Symbols

	Contact (Dashed where inferred, dotted where buried)
	Normal Fault (Dashed where inferred, dotted where buried)
	Thrust Fault (Dashed where inferred, dotted where buried)
	-Syncline Axis
	-Anticline Axis

**J.R. SIMPLOT COMPANY**

SMOKY CANYON MINE RI/FS  
FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-2

## EXPLANATION FOR GEOLOGIC MAP

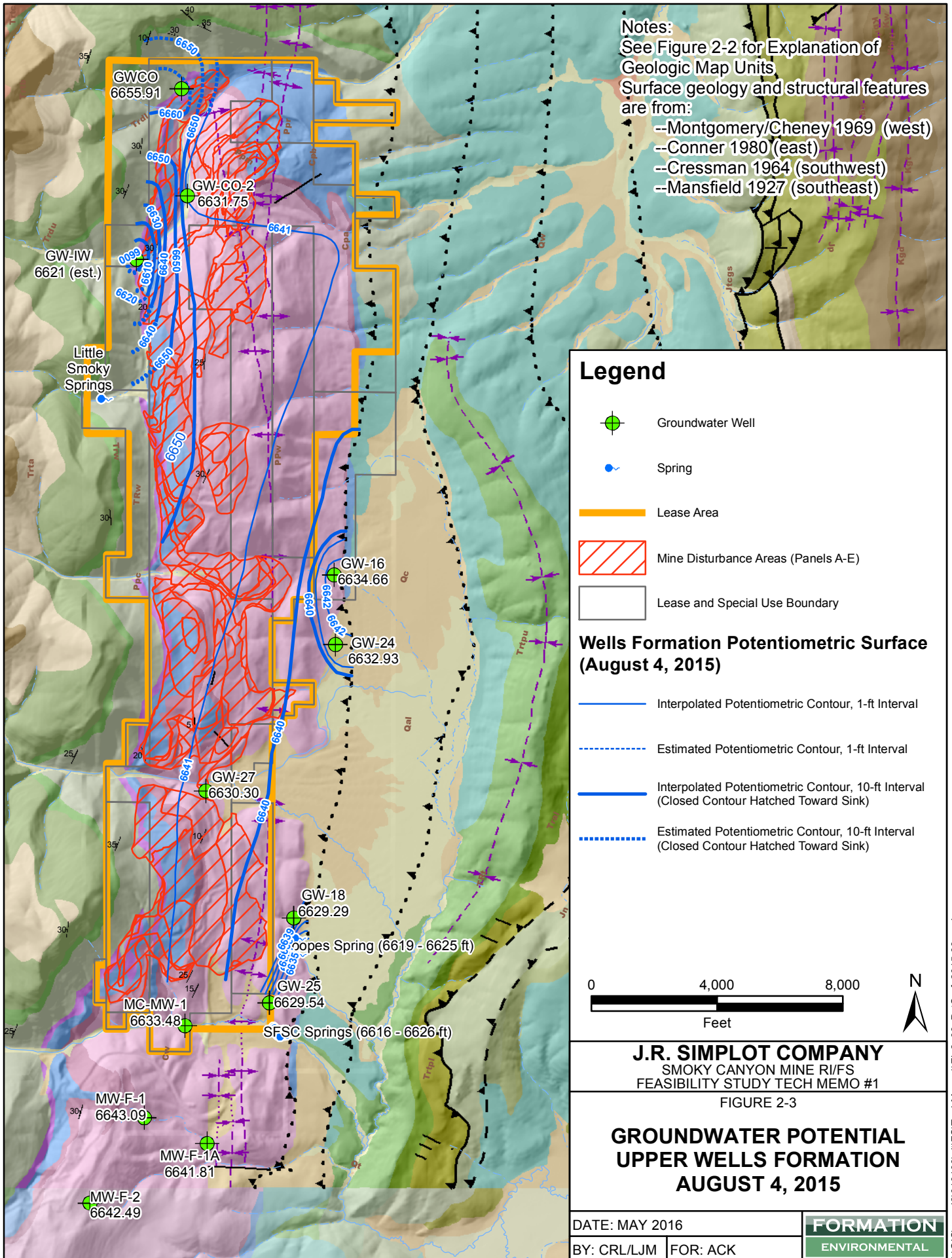
DATE: MAY 2016

BY: CRL

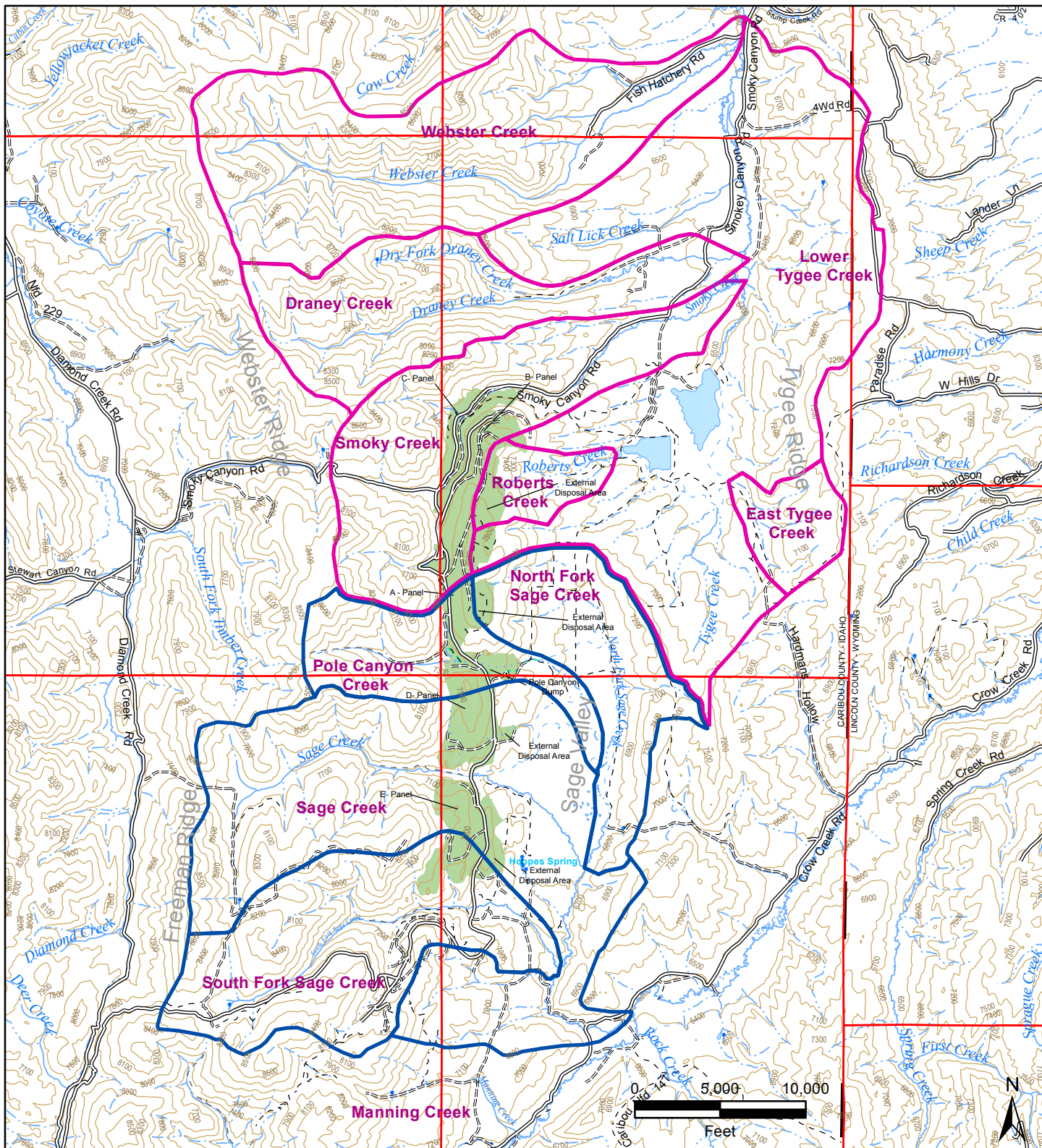
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## Legend

— Minor Road	— Intermittent Stream
== Unimproved Road	— Perennial Stream
- - - Trail (4WD)	■ Lake/Pond
- - - Trail (Other than 4WD)	■ Mine Disturbance
- - - Pipeline	<b>Watershed Features</b>
... Historic Flow Path	■ Sage Creek Basin (Drains to Crow Creek)
- - - Canal Ditch	■ Tygee Creek Basin (Drains to Stump Creek)

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FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-4

## SMOKY CANYON MINE AND VICINITY HYDROLOGIC FEATURES

DATE: MAY 2016

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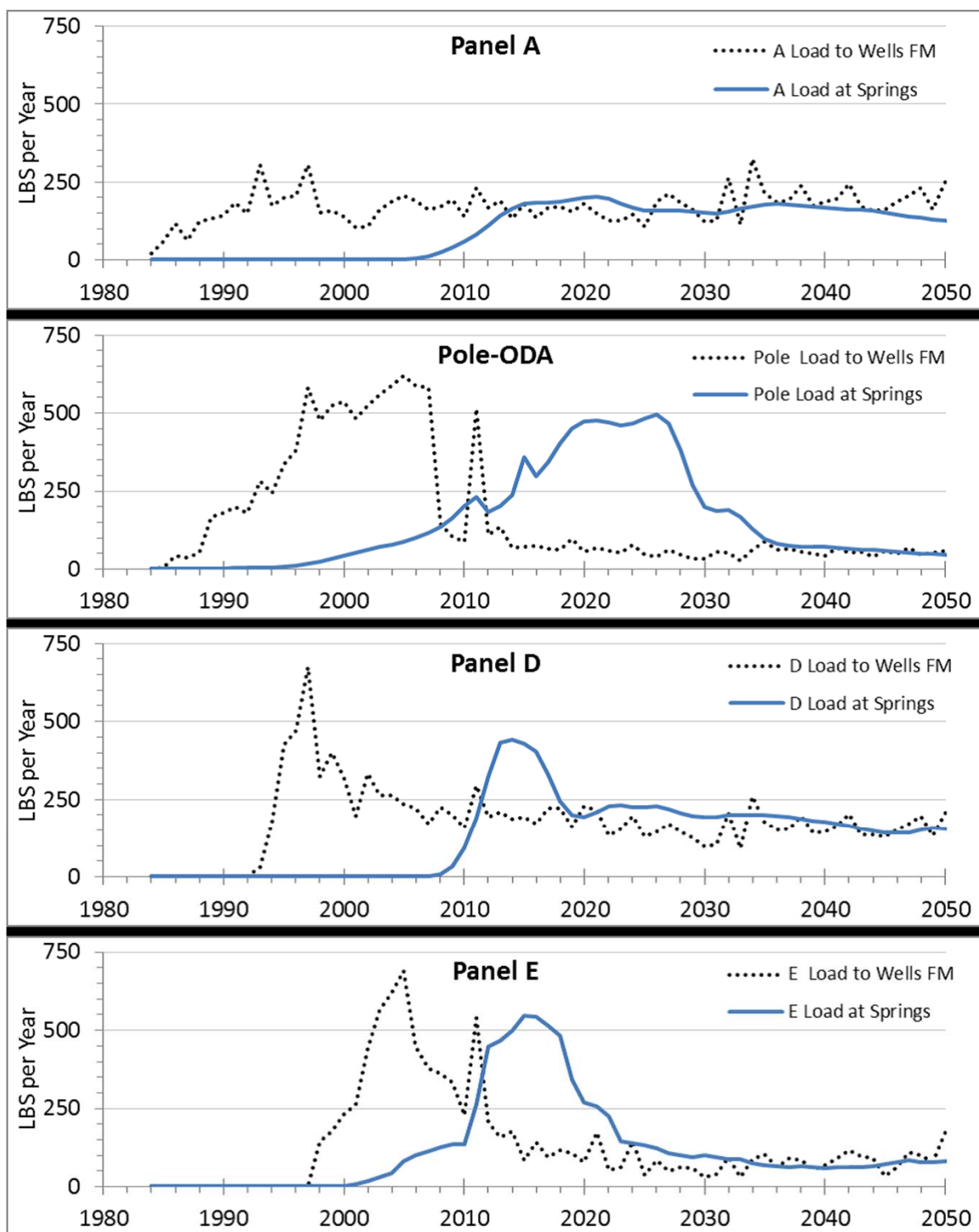
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FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-5

**ESTIMATED SELENIUM MASS LOAD TO  
THE WELLS FORMATION AND ARRIVAL  
AT SPRINGS COMPLEX FOR EACH  
SOURCE AREA**

DATE: APRIL 2016

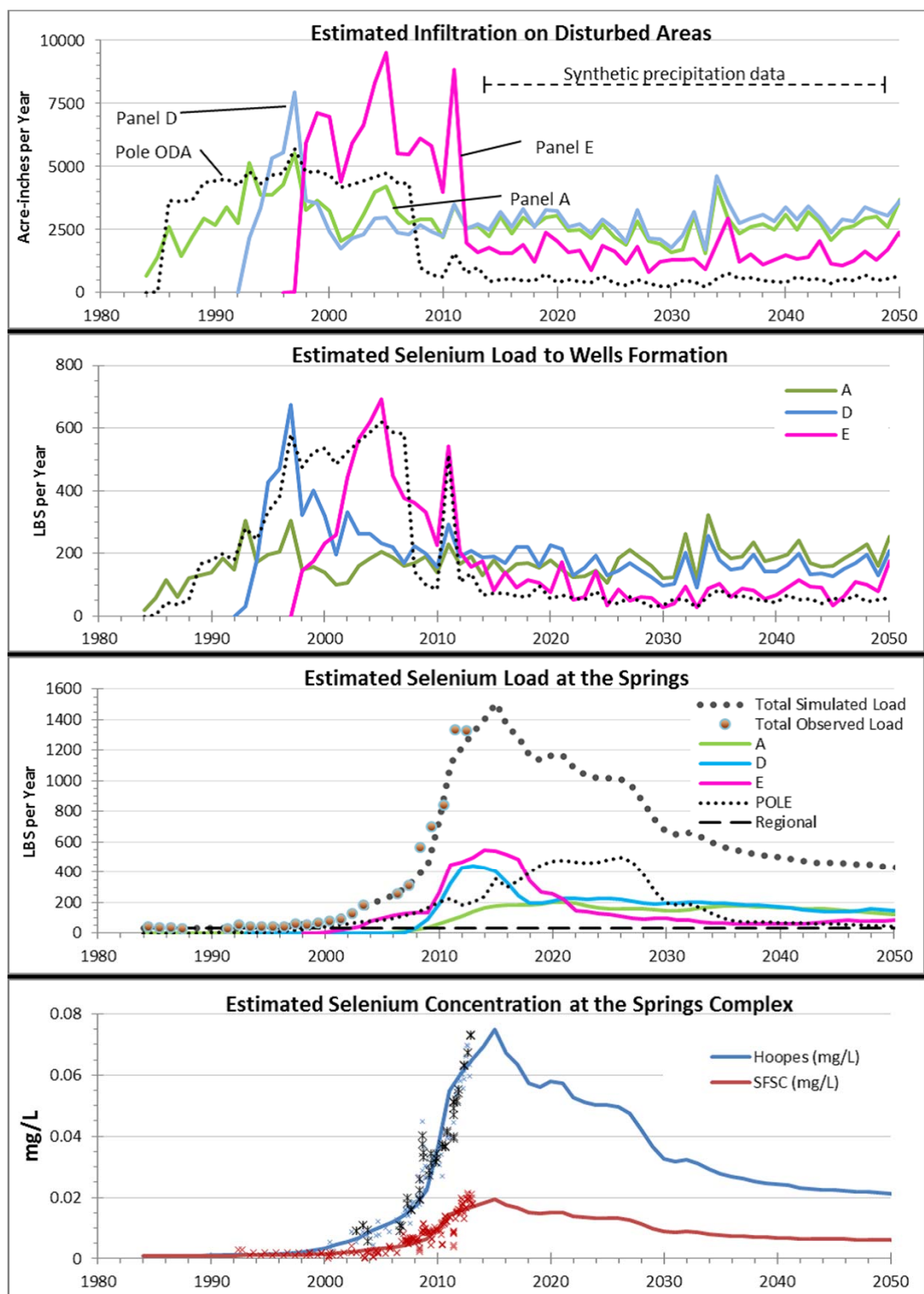
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FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-6

## **ESTIMATED INFILTRATION ON DISTURBERD AREAS, ESTIMATED SELENIUM LOADING TO WELLS FORMATION AND SPRINGS COMPLEX**

DATE: APRIL 2016

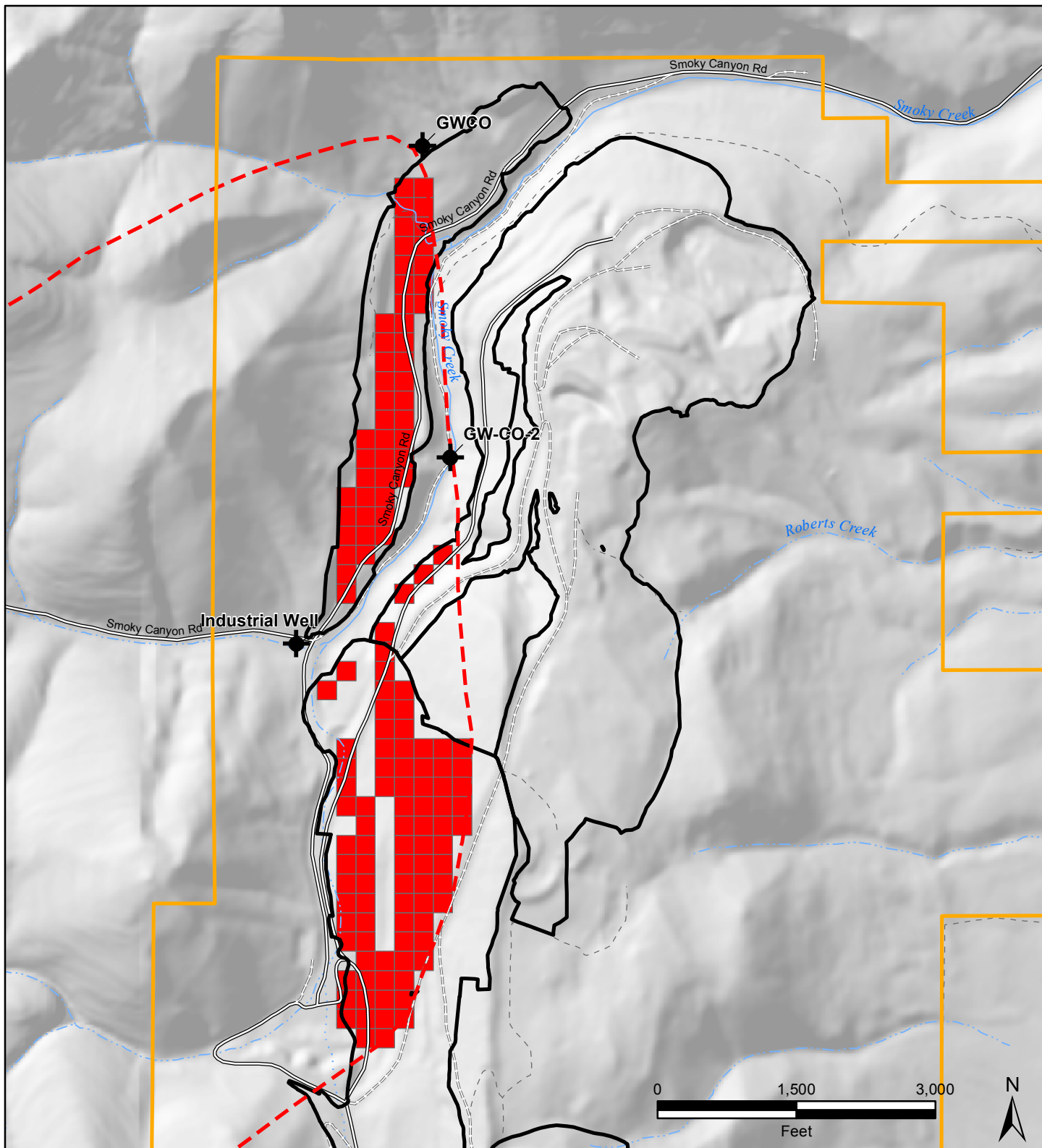
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






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# Legend

-  Groundwater Monitoring Locations
-  Lease Area
-  Minor Road
-  Structural Influence
-  Unimproved Road
-  Approximate Mine Panel Boundaries
-  Trail (4WD)
-  Backfilled Areas (Source Cells) v2
-  Historic Flow Path
-  Intermittent Stream
-  Perennial Stream

## J.R. SIMPLOT COMPANY SMOKY CANYON MINE RI/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-7

### MODEL GRID CELLS REPRESENTING AREAS OF SELENIFEROUS BACKFILL (2012 CONDITIONS) INSIDE ASSUMED GW-IW CAPTURE ZONE

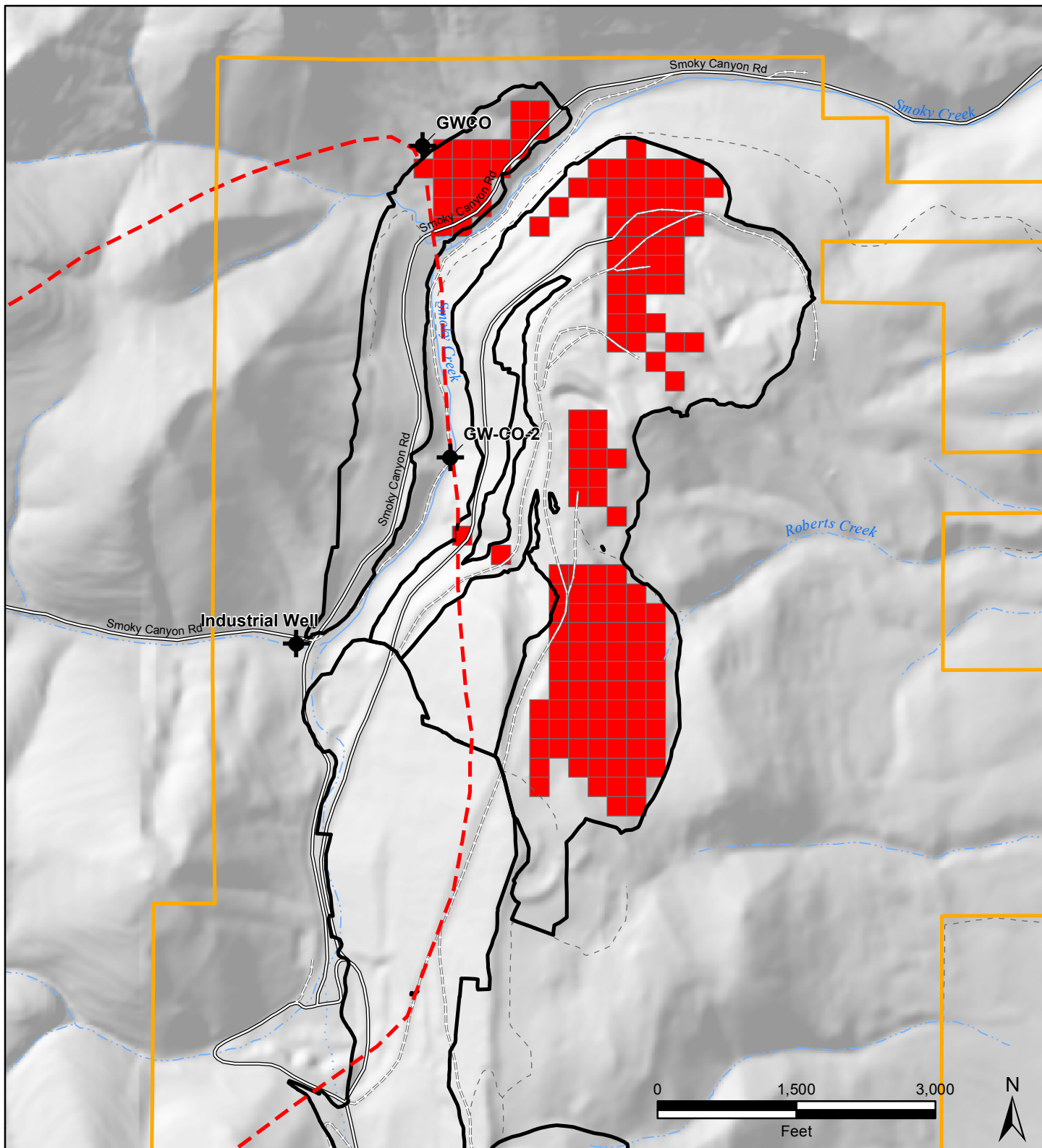
DATE: MAY 12, 2016

BY:

FOR:

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ENVIRONMENTAL





### Legend

- |  |                                  |  |                                    |
|--|----------------------------------|--|------------------------------------|
|  | Groundwater Monitoring Locations |  | Lease Area                         |
|  | Minor Road                       |  | Structural Influence               |
|  | Unimproved Road                  |  | Approximate Mine Panel Boundaries  |
|  | Trail (4WD)                      |  | Backfilled Areas (Source Cells) v2 |
|  | Historic Flow Path               |  |                                    |
|  | Intermittent Stream              |  |                                    |
|  | Perennial Stream                 |  |                                    |

### J.R. SIMPLOT COMPANY SMOKY CANYON MINE RI/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-8

### MODEL GRID CELLS REPRESENTING AREAS OF SELENIFEROUS BACKFILL (2012 CONDITIONS) OUTSIDE ASSUMED GW-IW CAPTURE ZONE

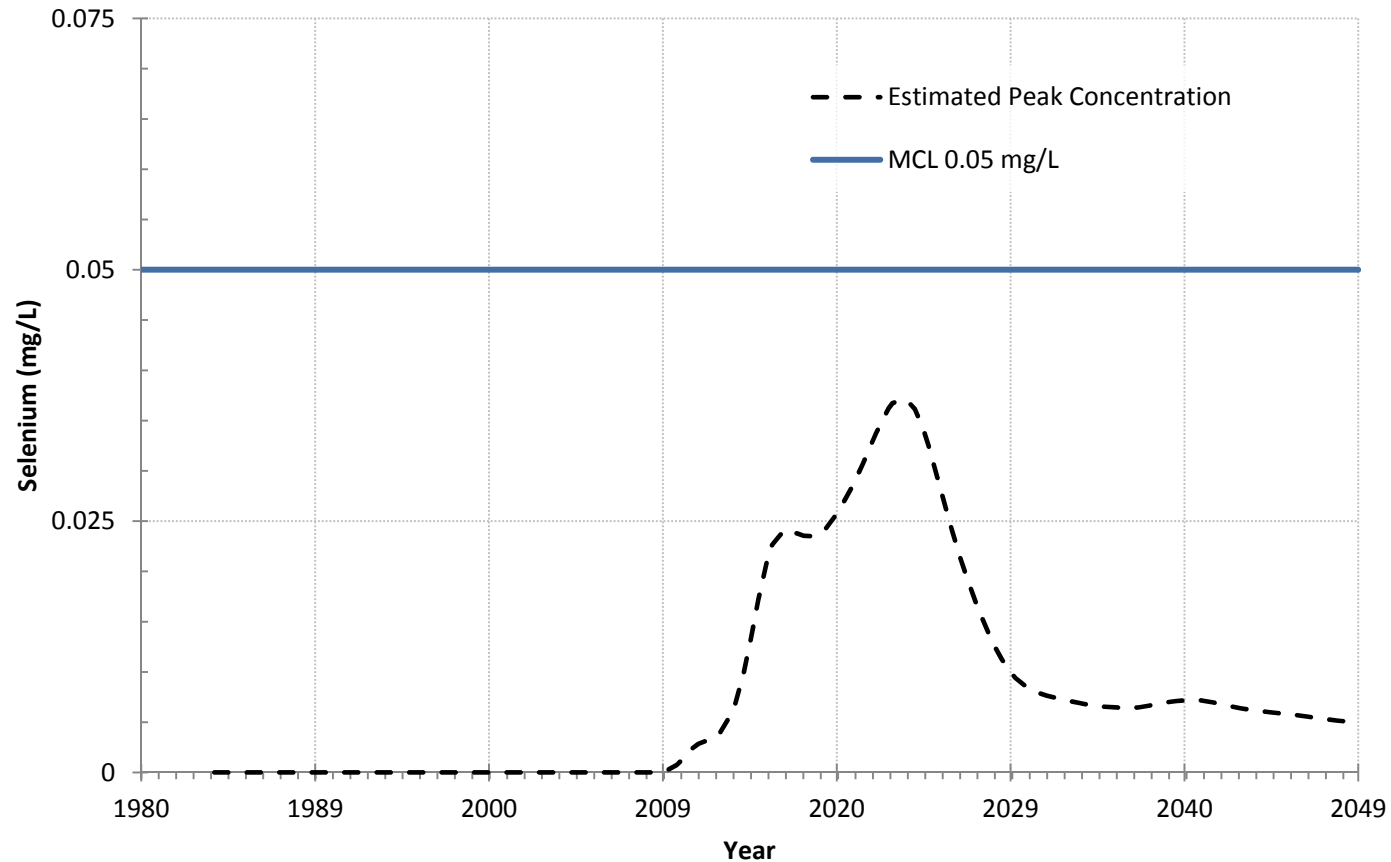
DATE: MAY 12, 2016

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SMOKY CANYON MINE RI/FS  
FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-9

**POTENTIAL SELENIUM CONCENTRATION  
IN GROUNDWATER AT THE NORTHERN  
LEASE BOUNDARY**

DATE: MAY 2016

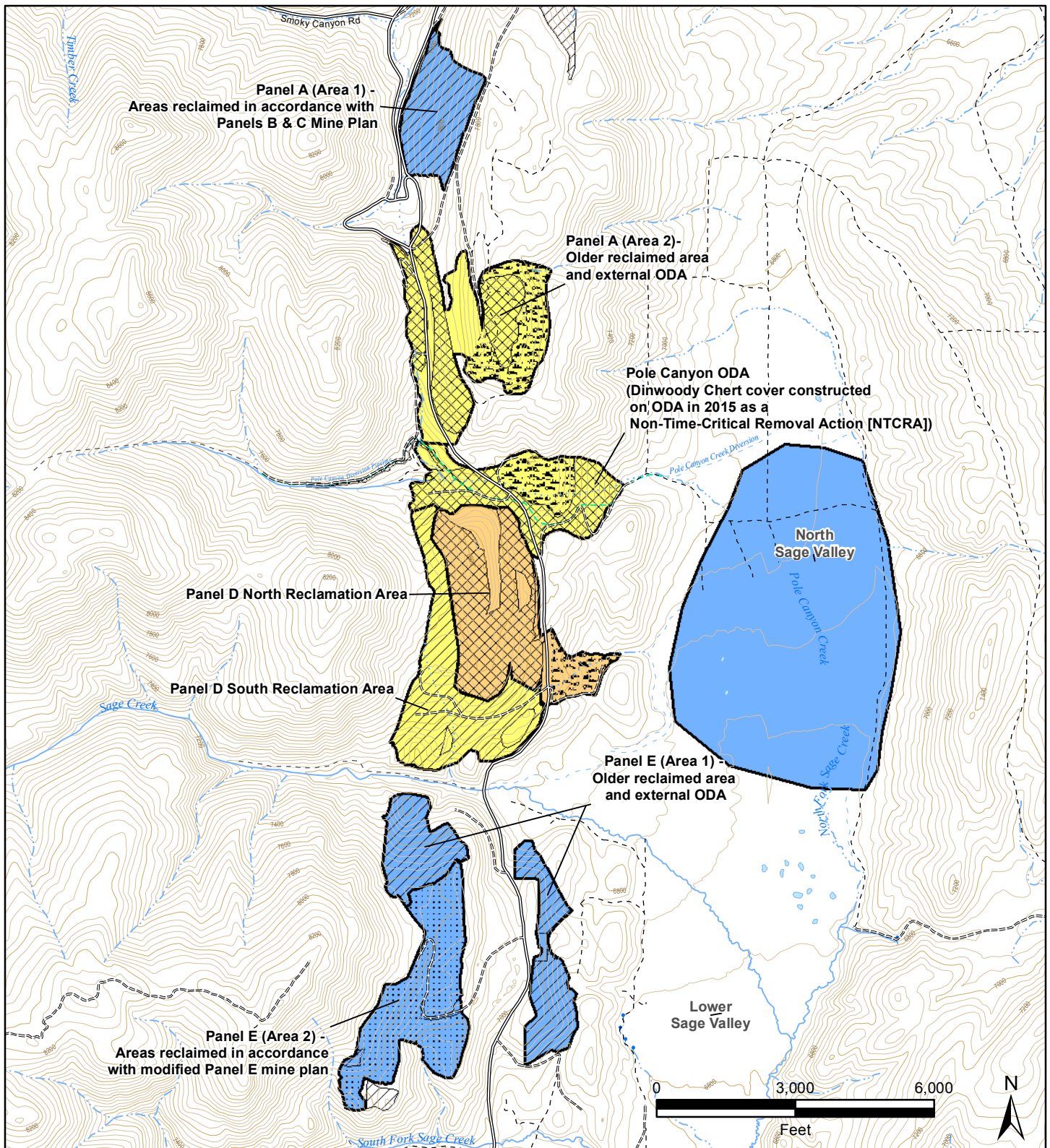
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**ENVIRONMENTAL**





## Legend

### Cover Type

- TOPSOIL DINWOODY CHERT
- NO TOPSOIL NO CHERT
- TOPSOIL OVER CHERT
- TOPSOIL NO CHERT

### Selenium Risk

- Lowest Risk
- Moderate - High Risk
- Highest Risk

- Minor Road
- Unimproved Road
- Trail (4WD)
- Trail (Other than 4WD)
- Index Contour (200 ft)
- Intermediate Contour (40 ft)

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SMOKY CANYON MINE RI/FS  
FEASIBILITY STUDY TECH MEMO #1

FIGURE 2-10

## SUMMARY OF SELENIUM RISK TO TERRESTRIAL BIOTA

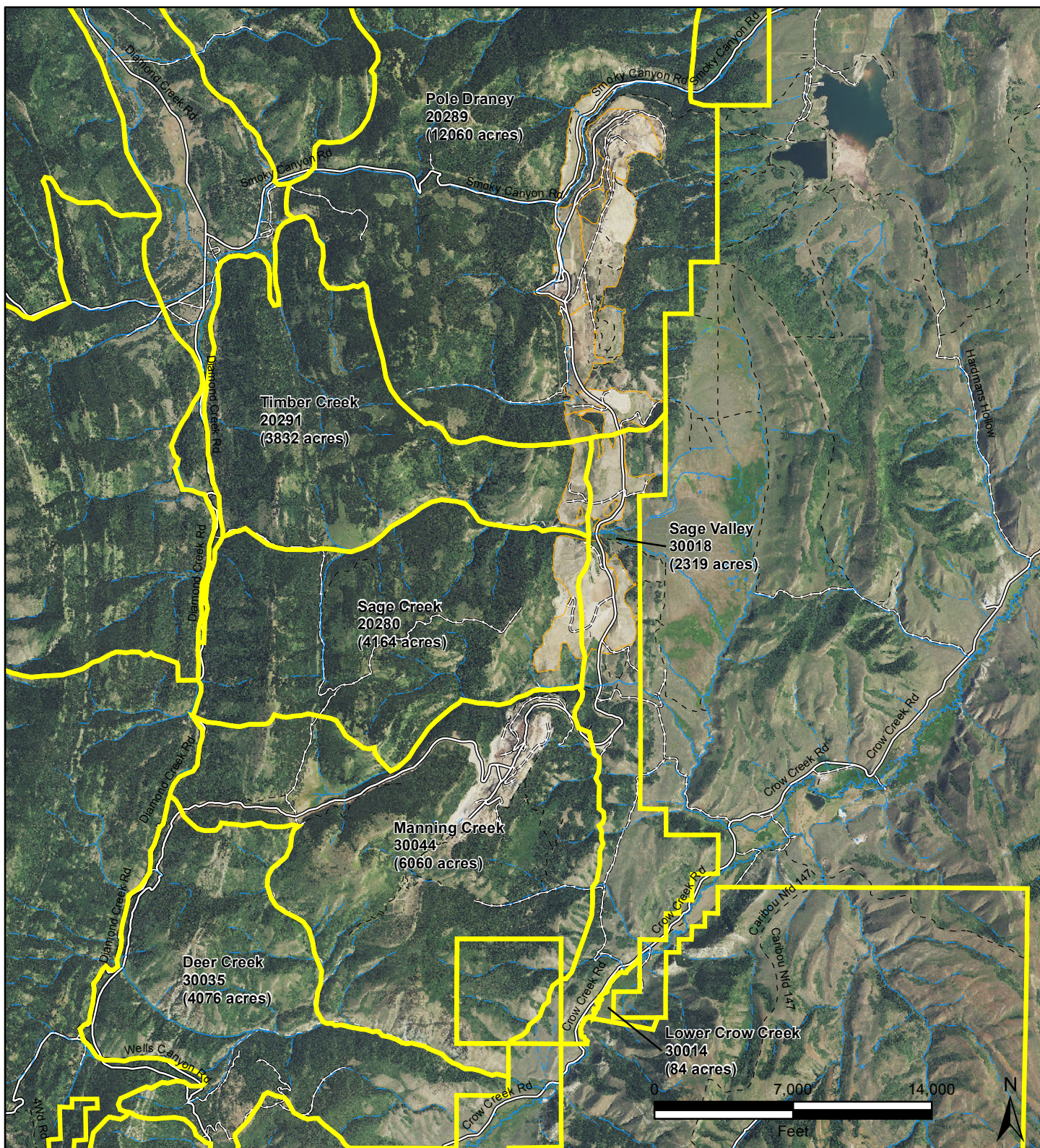
DATE: MAY 2016

BY: CRL





FOR: ACK

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## Legend

- |  |  |
|--|--|
|  Grazing Allotment (USFS) |  Mine Disturbance Area (Panels A-E) |
|  Perennial Stream         |  |
|  Intermittent Stream      |  |

Allotments in vicinity of Smoky Canyon Mine are labeled.  
 Source: U.S. Forest Service (USFS), 2008. Range allotments shapefile - in Geographic Information System (GIS) coverages provided by Caribou National Forest, via e-mail, April 2008.  
 Aerial Source: 2013 NAIP photo from USDA

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FIGURE 2-11

## USFS GRAZING ALLOTMENTS - WITH SATELLITE IMAGERY

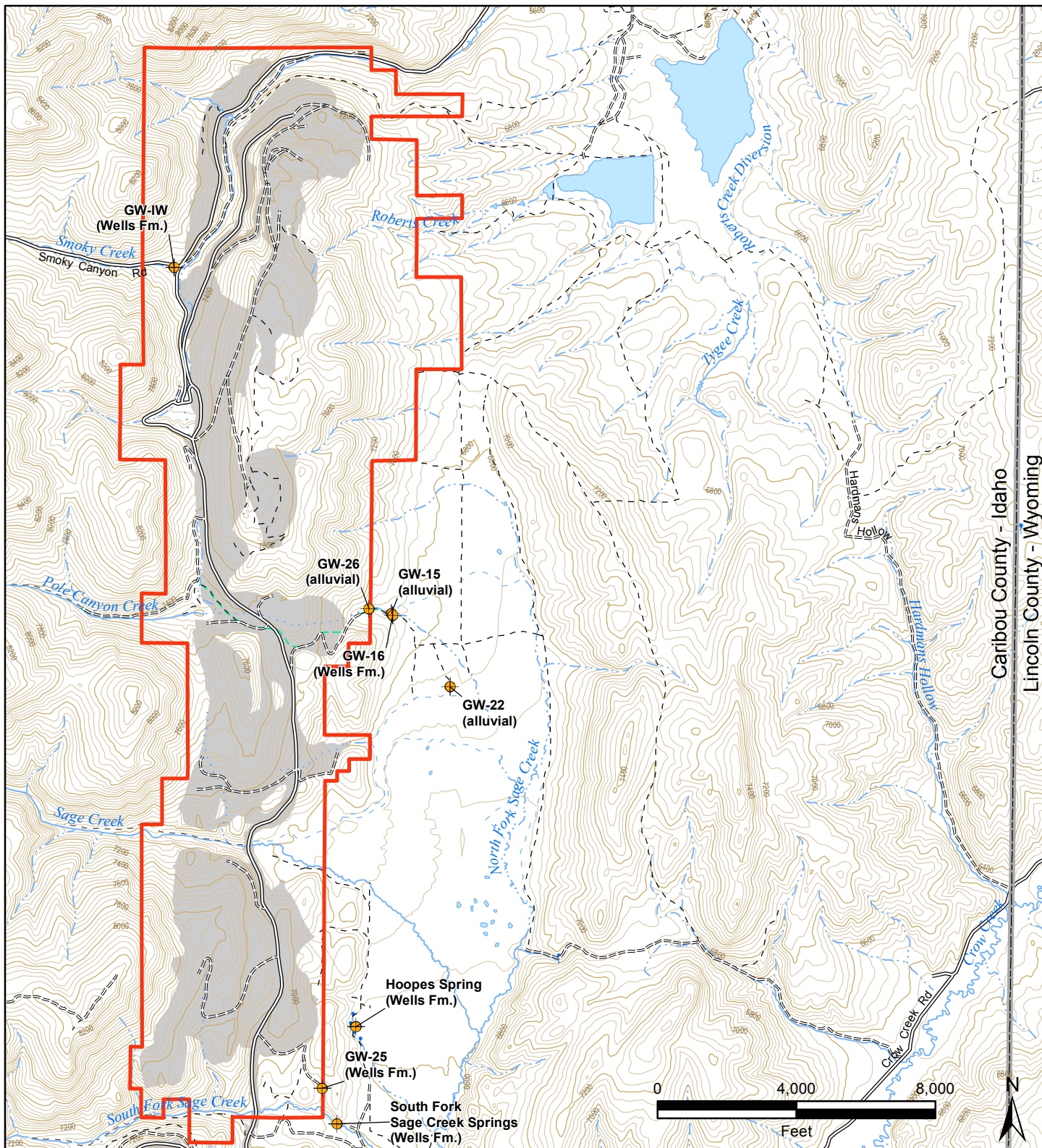
DATE: MAY 2016

BY: CRL

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## Legend

	Groundwater Monitoring Locations Exceeding Selenium MCL (0.05 mg/L)		Perennial Stream		Index Contour (200 ft)
	Minor Road		Intermittent Stream		Intermediate Contour (40 ft)
	Unimproved Road		Canal Ditch		Lake/Pond
	Trail (4WD)		Historic Flow Path		Mine Disturbance Area
	Trail (Other than 4WD)		Pipeline		Lease Area

MCL = Maximum Contaminant Level (0.05 mg/L)

## J.R. SIMPLOT COMPANY SMOKY CANYON MINE R/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 3-1

## EXCEEDANCES OF SELENIUM MCL IN GROUNDWATER

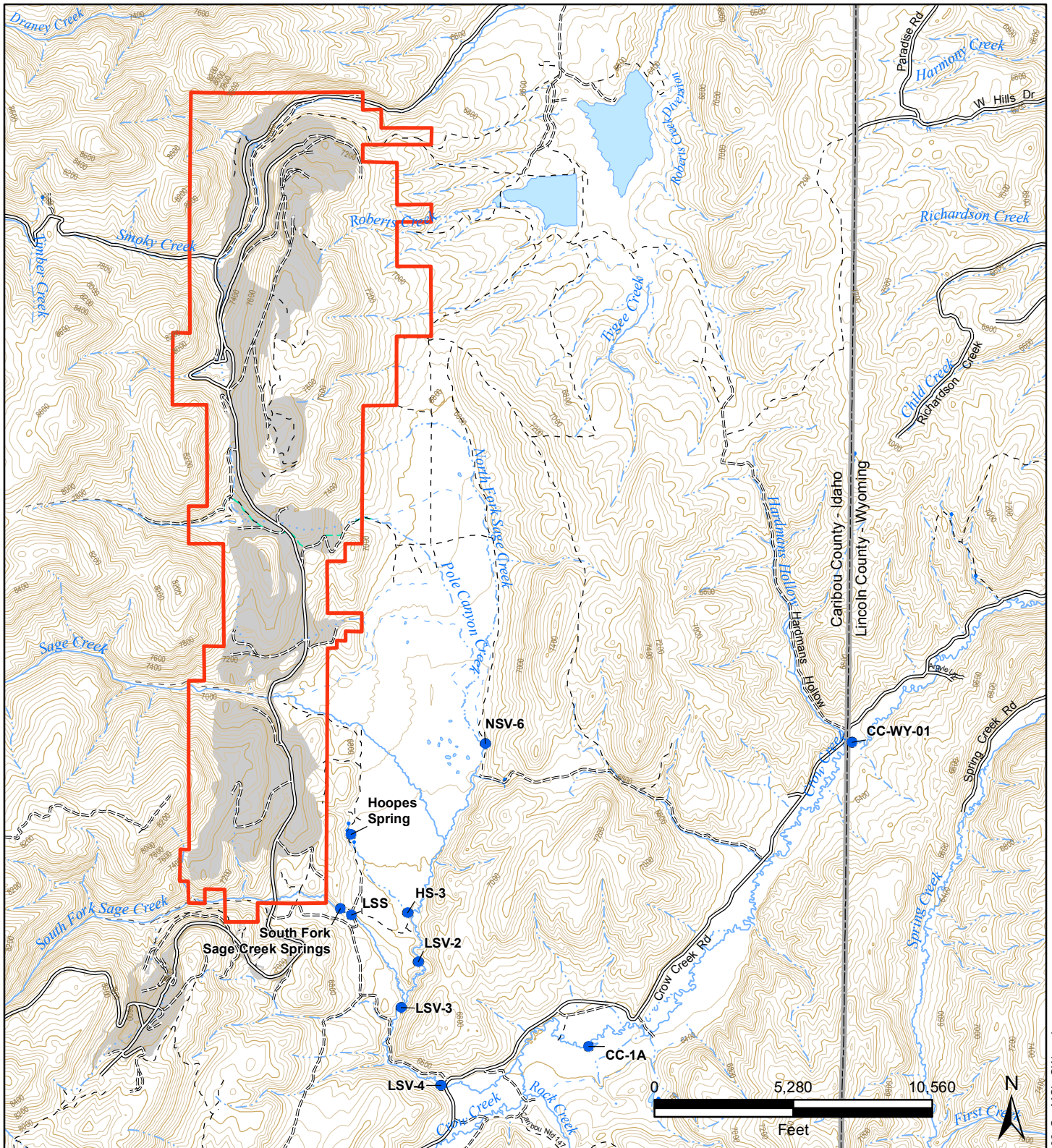
DATE: MAY 2016

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## Legend

<p>Surface Water Monitoring Locations Exceeding State of Idaho Surface Water Quality (Selenium) Criteria for Aquatic Life (0.005 mg/L)</p> <p>●</p>	<p>Perennial Stream</p> <p>Intermittent Stream</p> <p>Canal Ditch</p> <p>Historic Flow Path</p> <p>Pipeline</p>	<p>Index Contour (200 ft)</p> <p>Intermediate Contour (40 ft)</p> <p>Lake/Pond</p> <p>Mine Disturbance Area</p> <p>Lease Area</p>
<p>Minor Road</p> <p>Unimproved Road</p> <p>Trail (4WD)</p> <p>Trail (Other than 4WD)</p>		

## J.R. SIMPLOT COMPANY SMOKY CANYON MINE R/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 3-2

## EXCEEDANCES OF SELENIUM CRITERION IN SURFACE WATER

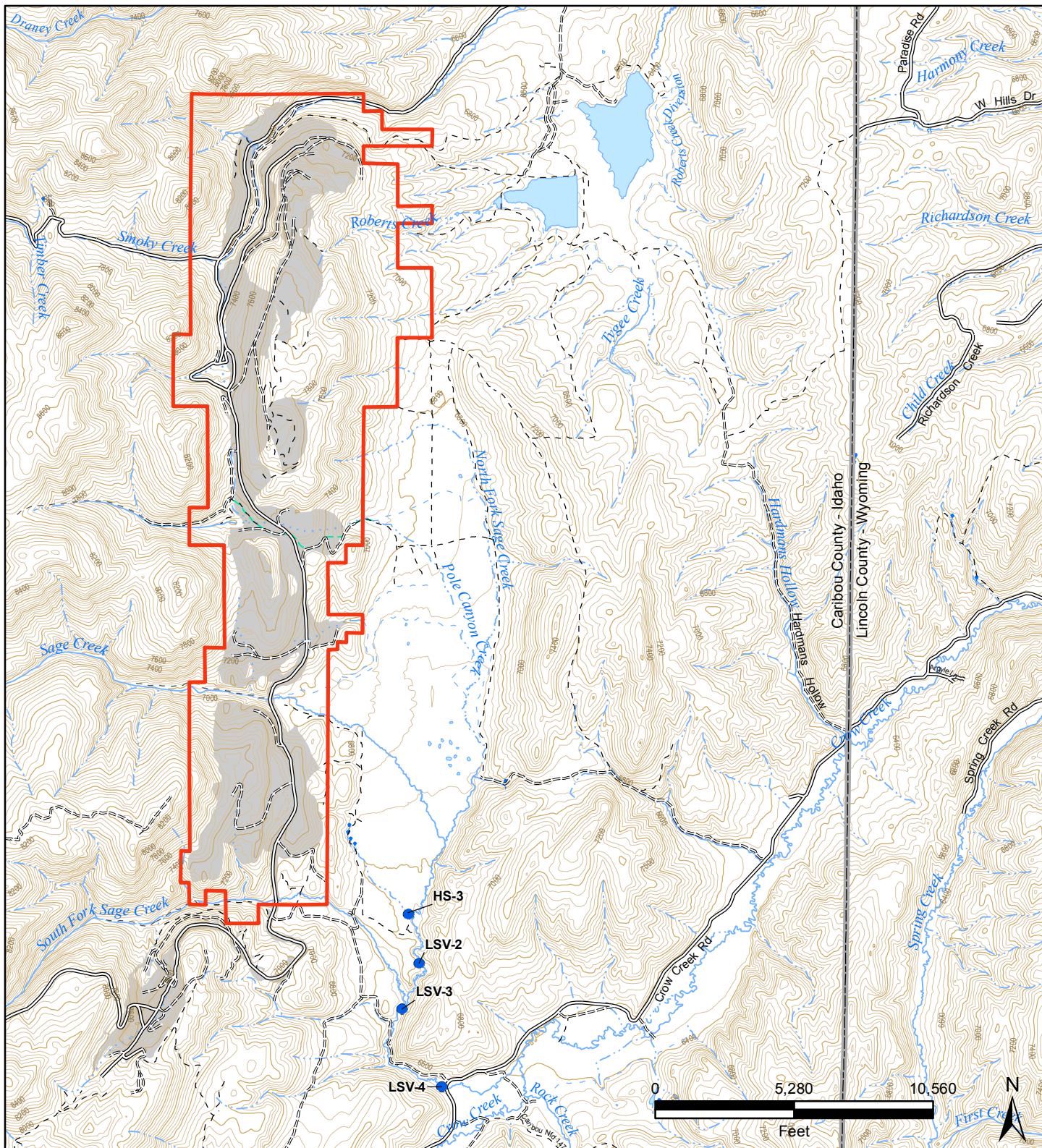
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## Legend

● Surface Water Monitoring Locations with Elevated Selenium Risk to Aquatic Biota (Whole Body Tissue > 14.14 mg/kg dry weight)	— Perennial Stream	— Index Contour (200 ft)
— Minor Road	- - - Intermittent Stream	— Intermediate Contour (40 ft)
===== Unimproved Road	- - - Canal Ditch	■ Lake/Pond
- - - Trail (4WD)	· · · · · Historic Flow Path	■ Mine Disturbance Area
- - - Trail (Other than 4WD)	- - - Pipeline	— Lease Area

## J.R. SIMPLOT COMPANY SMOKY CANYON MINE R/I/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 3-3

## ELEVATED SELENIUM RISK TO AQUATIC BIOTA (WHOLE BODY FISH TISSUE)

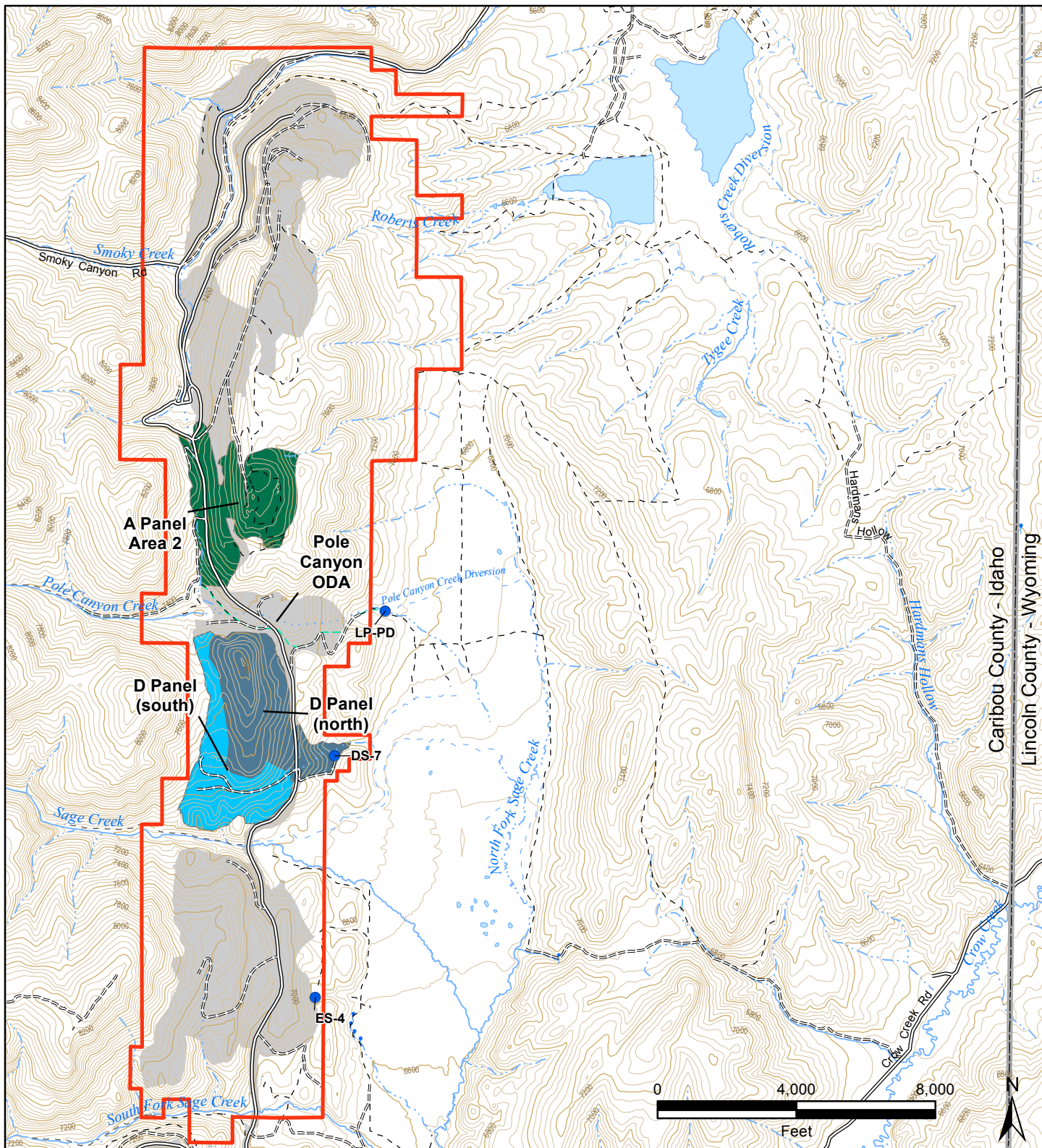
DATE: MAY 2016

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# Legend

● Monitoring Locations with Elevated Selenium Risk	— Perennial Stream	■ Lake/Pond
— Minor Road	- - - Intermittent Stream	■ Mine Disturbance Area
==== Unimproved Road	- - - Canal Ditch	
- - - Trail (4WD)	- - - Historic Flow Path	<b>Sampling Areas with Elevated Selenium Risk</b>
- - - Trail (Other than 4WD)	- - - Pipeline	■ Panel A (Area 2)
	— Lease Area	■ Panel D (north)
		■ Panel D (south)

Note: Selenium risk to terrestrial biota on the Pole Canyon ODA has been eliminated as a result of the Pole Canyon ODA NTCRA cover constructed in 2015.

## J.R. SIMPLOT COMPANY SMOKY CANYON MINE R/FS FEASIBILITY STUDY TECH MEMO #1

FIGURE 3-4

## ELEVATED SELENIUM RISK TO TERRESTRIAL BIOTA FROM SOIL AND BIOTIC MEDIA

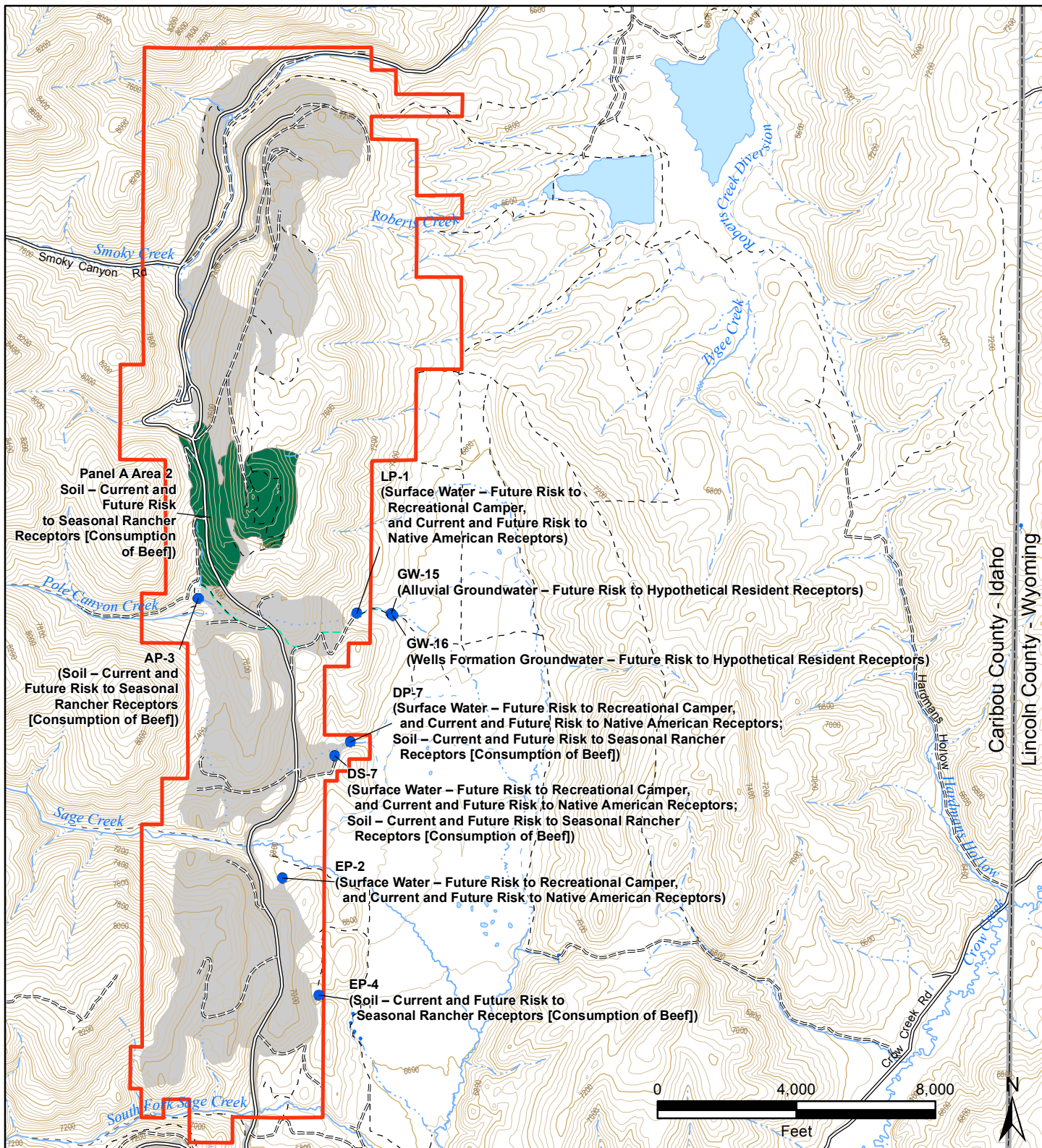
DATE: MAY 2016

BY: CRL

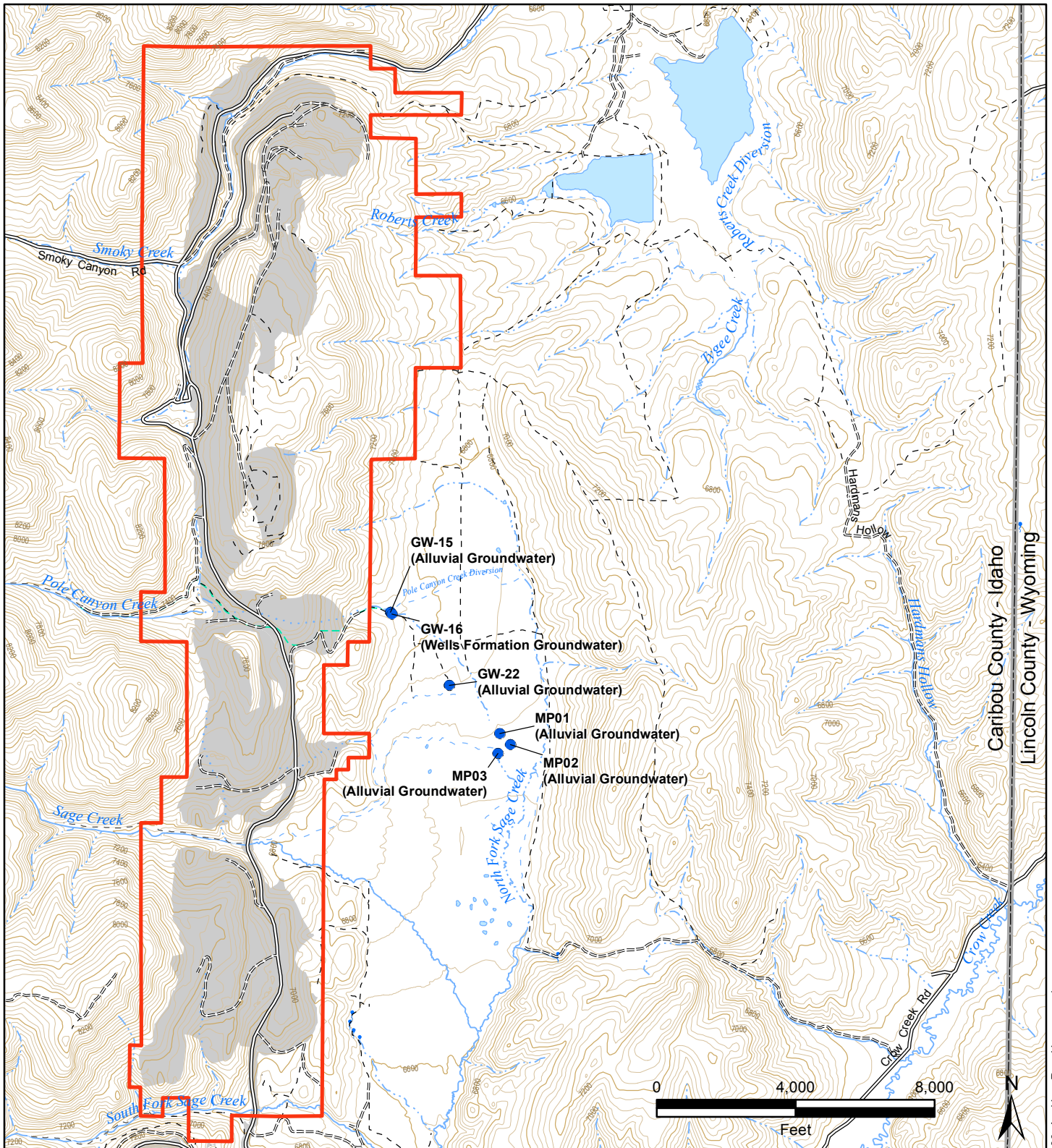
FOR: ACK

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Legend			
<span style="color: blue;">●</span>	Monitoring Locations with Future Elevated Selenium Risk	<span style="color: blue;">—</span>	Perennial Stream
<span style="color: blue;">---</span>	Minor Road	<span style="color: blue;">- - -</span>	Intermittent Stream
<span style="color: blue;">= = = =</span>	Unimproved Road	<span style="color: blue;">- - - -</span>	Canal Ditch
<span style="color: blue;">- - - -</span>	Trail (4WD)	<span style="color: blue;">- - - -</span>	Historic Flow Path
<span style="color: blue;">- - - -</span>	Trail (Other than 4WD)	<span style="color: blue;">- - - -</span>	Pipeline
<span style="color: brown;">—</span>	Index Contour (200 ft)	<span style="color: grey;">■</span>	Mine Disturbance Area
<span style="color: brown;">—</span>	Intermediate Contour (40 ft)	<span style="color: red;">—</span>	Lease Area
<span style="color: lightblue;">■</span>	Lake/Pond		

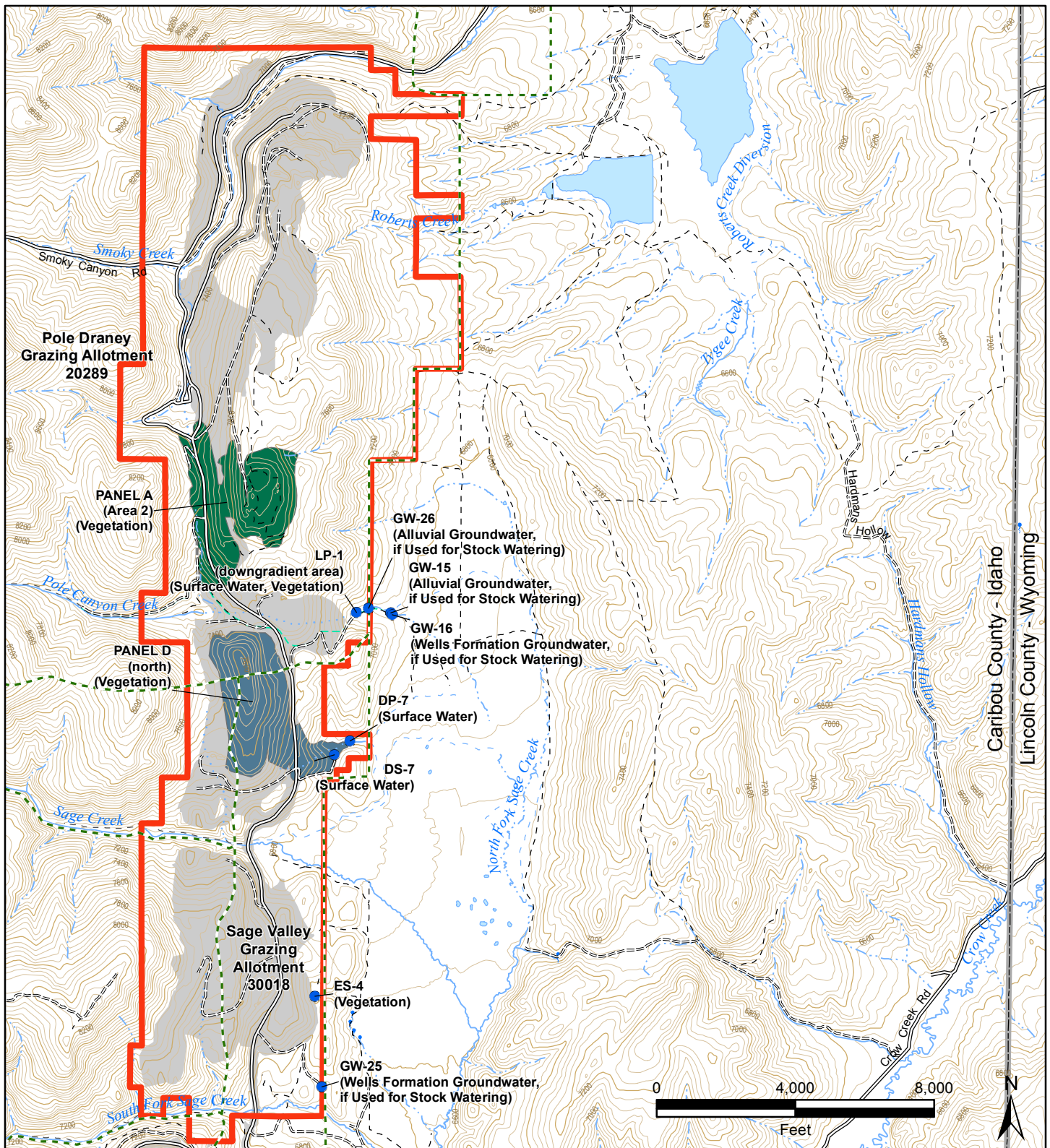
**J.R. SIMPLOT COMPANY**  
 SMOKY CANYON MINE R/FS  
 FEASIBILITY STUDY TECH MEMO #1

FIGURE 3-6

**FUTURE ELEVATED SELENIUM  
 DRINKING WATER RISK TO  
 HYPOTHETICAL RESIDENT  
 HUMAN RECEPTORS**

DATE: MAY 2016		<b>FORMATION ENVIRONMENTAL</b>
BY: CRL	FOR: ACK	





<b>Legend</b>		
● Monitoring Locations with Future Acute Selenium Risk	— Perennial Stream	■ Lake/Pond
— Minor Road	- - - Intermittent Stream	■ Mine Disturbance Area
- - - Unimproved Road	- - - Canal Ditch	■ Grazing Allotment (USFS)
- - - Trail (4WD)	- - - Historic Flow Path	■ Lease Area
- - - Trail (Other than 4WD)	- - - Pipeline	
— Index Contour (200 ft)		<b>Sampling Areas with Future Selenium Risk</b>
— Intermediate Contour (40 ft)		■ Panel A (Area 2)
		■ Panel D (north)

<b>J.R. SIMPLOT COMPANY</b> SMOKY CANYON MINE R/FS FEASIBILITY STUDY TECH MEMO #1 FIGURE 3-7 <b>FUTURE ACUTE SELENIUM RISK TO LIVESTOCK</b>		
DATE: MAY 2016	<b>FORMATION ENVIRONMENTAL</b>	
BY: CRL	FOR: ACK	



FIGURE 4-1. IDENTIFICATION OF REMEDIAL TECHNOLOGIES AND PROCESS OPTIONS

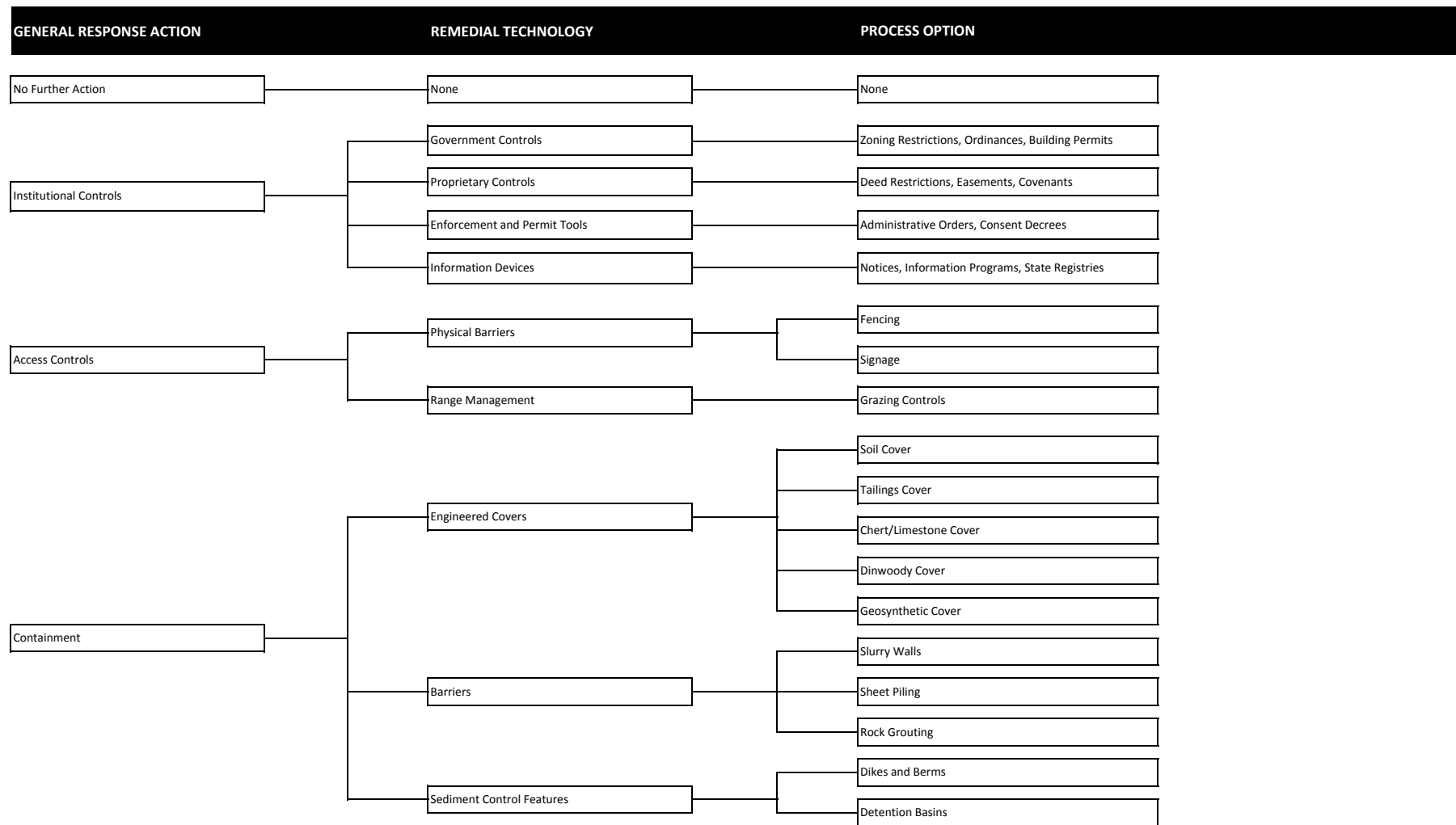




FIGURE 4-1. IDENTIFICATION OF REMEDIAL TECHNOLOGIES AND PROCESS OPTIONS

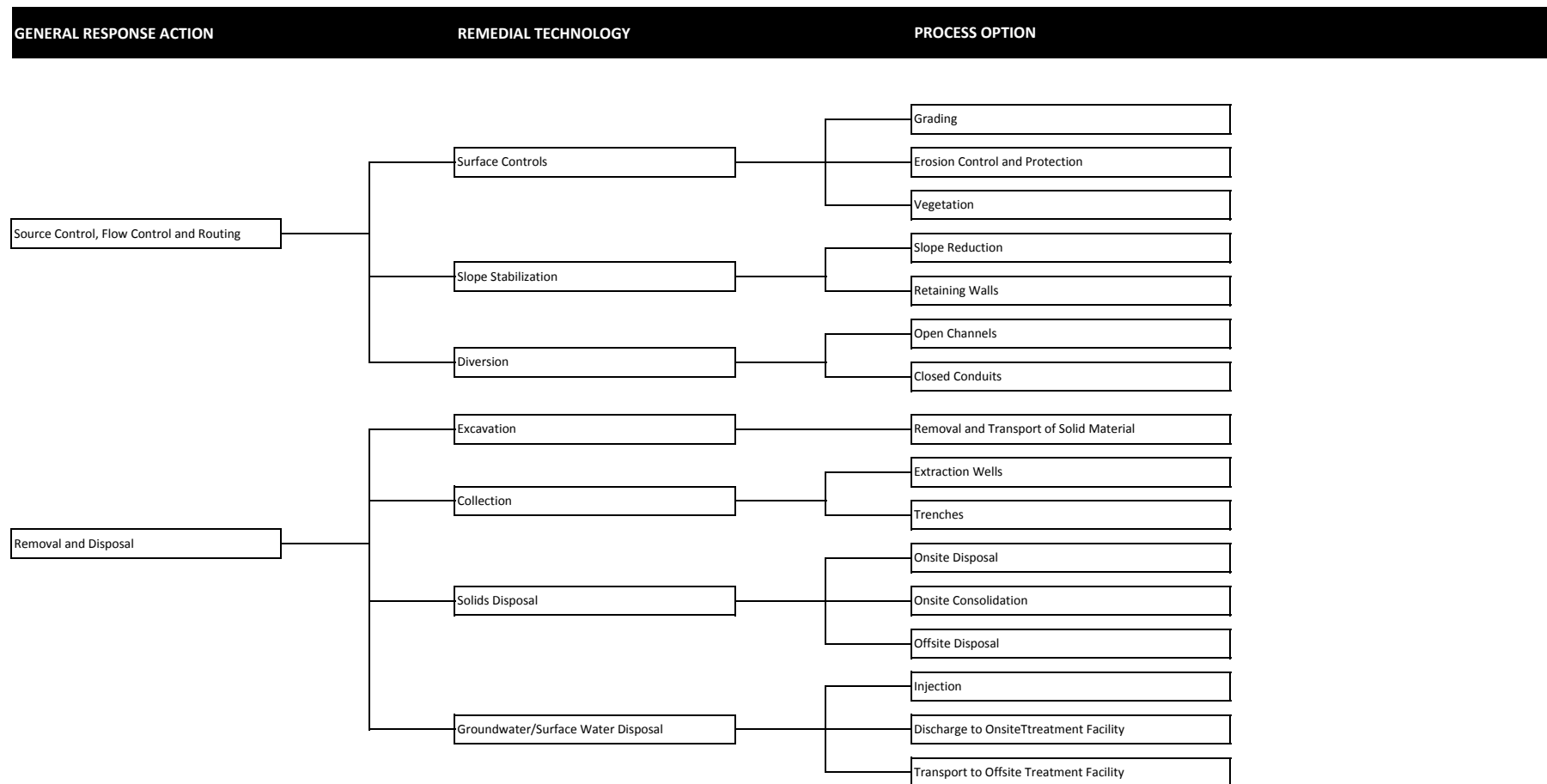




FIGURE 4-1. IDENTIFICATION OF REMEDIAL TECHNOLOGIES AND PROCESS OPTIONS

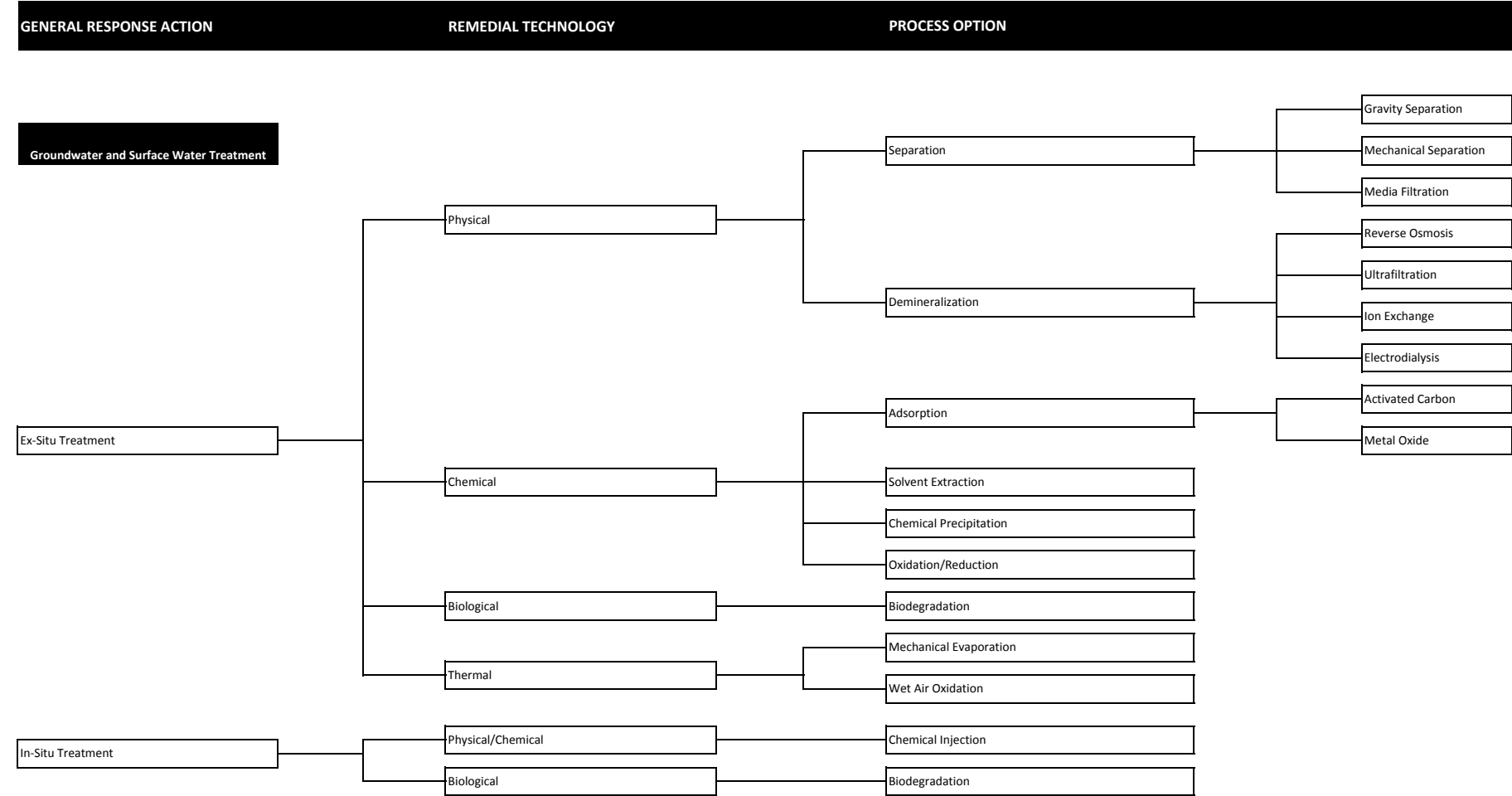




FIGURE 4-1. IDENTIFICATION OF REMEDIAL TECHNOLOGIES AND PROCESS OPTIONS

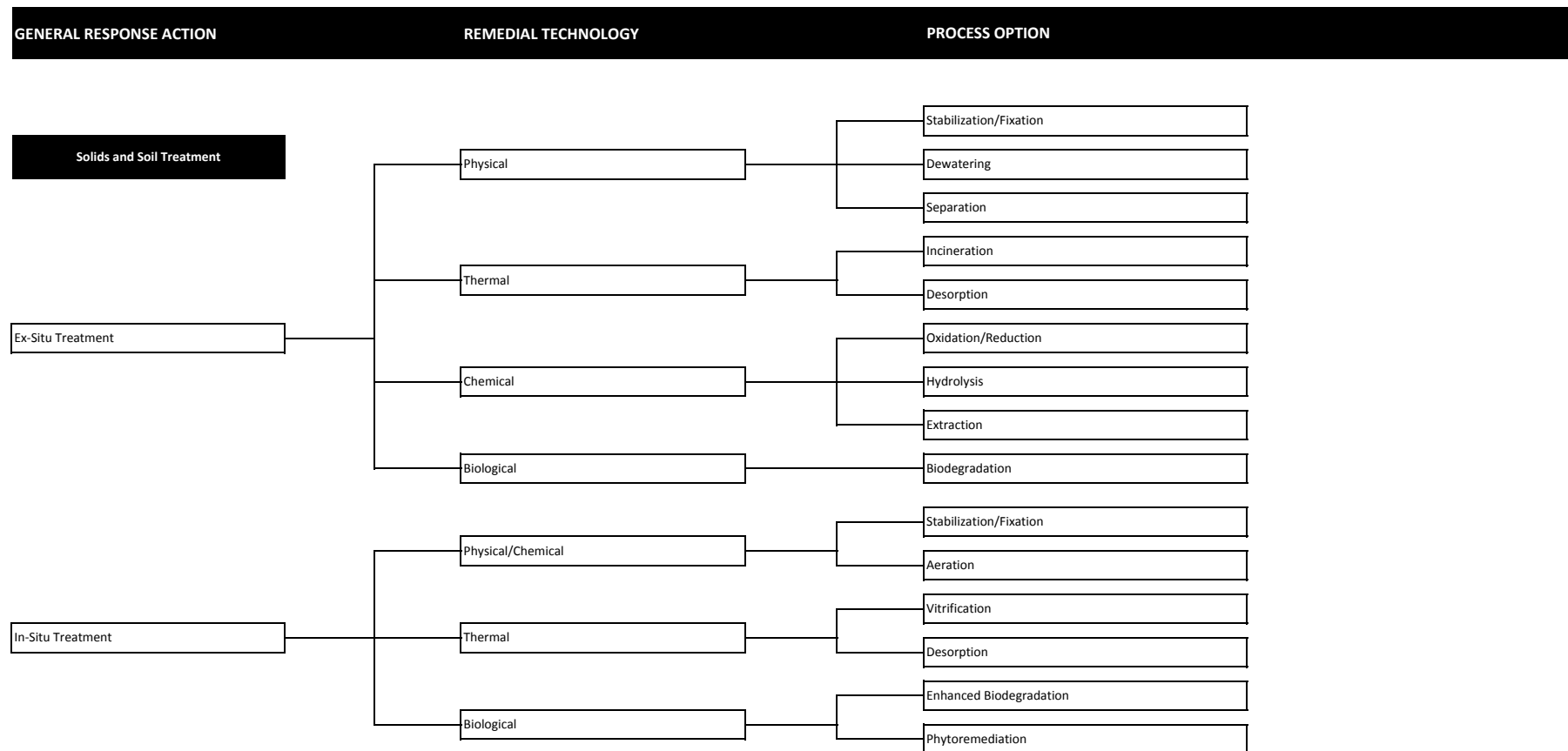




FIGURE 4-2. INITIAL SCREENING OF TECHNOLOGIES AND PROCESS OPTIONS FOR IMPLEMENTABILITY

GENERAL RESPONSE ACTION	REMEDIAL TECHNOLOGY	PROCESS OPTION	PROCESS OPTION	DESCRIPTION	SCREENING COMMENT
No Further Action	None	None		No further action.	Required by the NCP as a baseline for comparison.
Institutional Controls	Government Controls	Zoning Restrictions, Ordinances, Building Permits		State or county laws or regulations that restrict or control land or resource use.	Potentially implementable.
	Proprietary Controls	Deed Restrictions, Easements, Covenants		Deed restrictions prevent use of groundwater as drinking water and as stock tank water.	Potentially implementable.
	Enforcement and Permit Tools	Administrative Orders, Consent Decrees		Legal tools that limit ceratin activities or require the performance of specific activities.	Not implementable because agreements are not binding and would require enforcement.
	Information Devices	Notices, Information Programs, State Registries		Notification that residual or covered contamination remains at a site.	Potentially implementable.
Access Controls	Physical Barriers	Fencing		Fixed structures that function as boundaries or barriers.	Potentially implementable.
		Signage		Signs convey information on land use and use restrictions or warnings.	Potentially implementable.
	Range Management	Grazing Controls		Grazing controls limit the location, timing, and duration of livestock grazing.	Potentially implementable.
Containment	Engineered Covers	Soil Cover		Soil cover layer to limit infiltration, reduce seepage, and reduce uptake of selenium by plants.	Potentially implementable.
		Tailings Cover		Tailings cover layer to limit infiltration, reduce seepage, and reduce uptake of selenium by plants.	Potentially implementable.
		Chert/Limestone Cover		Chert/limestone layer to provide a capillary break and minimize burrowing and root growth.	Potentially implementable.
		Dinwoody Cover		Dinwoody cover layer to limit infiltration, reduce seepage, and reduce selenium uptake by plants.	Potentially implementable.
		Geosynthetic Cover		Clay and synthetic membrane (GCLL or GM) covered by soil to prevent infiltration and reduce seepage.	Potentially implementable.
	Barriers	Slurry Walls		Trench around ODAs or source materials filled with a soil bentonite slurry.	Not feasible because the Wells Formation aquifer is deep and highly fractured.
		Sheet Piling		Cutoff walls formed of wood, synthetics, pre-fabricated concrete, or steel.	Not feasible because the Wells Formation aquifer is deep and highly fractured.
		Rock Grouting		Pressure injection of grout in drilled holes or using vibrating beam method.	Not feasible because the Wells Formation aquifer is deep and highly fractured.
	Sediment Control Features	Dikes and Berms		Grading the land surface to control surface water runoff and sediment mobilization.	Potentially implementable.
		Detention Basins		Basins or ponds used to allow sediment to settle out of storm water runoff.	Potentially implementable.
	Technologies and/or process options screened out				

FIGURE 4-2. INITIAL SCREENING OF TECHNOLOGIES AND PROCESS OPTIONS FOR IMPLEMENTABILITY

GENERAL RESPONSE ACTION	REMEDIAL TECHNOLOGY	PROCESS OPTION	PROCESS OPTION	DESCRIPTION	SCREENING COMMENT	
Source Control, Flow Control and Routing	Surface Controls	Grading		Grading the land surface to manage surface water infiltration and runoff.	Potentially implementable in conjunction with source control and flow control technologies.	
		Erosion Control and Protection		Use of riprap, vegetation, and geosynthetic fabrics to reduce erosion.	Potentially implementable.	
		Vegetation		Application of soil and seeding with native plants to reduce infiltration, runoff, erosion.	Potentially implementable in conjunction with engineered covers.	
	Slope Stabilization	Slope Reduction		Reducing the grade of surface slopes of backfilled pits and ODAs.	Potentially implementable.	
		Retaining Walls		Vertical walls of steel, concrete, bricks, wood, or rock to stabilize steep slopes.	Potentially implementable.	
	Diversion	Open Channels		Engineered canals or ditches constructed to convey surface water.	Potentially implementable.	
		Closed Conduits		Culverts or pipes installed below ground to manage and control surface water.	Potentially implementable.	
	Removal and Disposal	Excavation	Removal and Transport of Solid Material		Excavation and transport of overburden/soils using earthmoving equipment.	Potentially implementable in conjunction with disposal technologies.
		Collection	Extraction Wells		Pumping well(s) used to extract contaminated groundwater.	Not feasible due to complex geology and preferential groundwater flow paths.
Trenches				Excavated ditches or channels to intercept and manage surface water or groundwater.	Not feasible due to complex geology and preferential groundwater flow paths.	
Solids Disposal		Onsite Disposal		Identification of an onsite location for disposal of treatment residuals or overburden/soils.	Potentially implementable for small volumes of material such as treatment residuals.	
		Onsite Consolidation		Consolidation and relocation of solids/soils or treatment residuals and disposal in mine pits.	Potentially implementable for small volumes of material such as treatment residuals.	
		Offsite Disposal		Disposal of hazardous material in a landfill offsite.	Potentially implementable for hazardous materials such as treatment residuals.	
Groundwater/ Surface Water Disposal		Injection		Disposal of impacted water by injection into deep wells.	Not feasible because deep groundwater is discharged to the surface at springs.	
		Discharge to Onsite Treatment Facility		Routing and discharge of impacted water to a treatment facility onsite.	Potentially implementable.	
		Transport to Offsite Treatment Facility		Transport of impacted water to a publicly owned treatment works (POTW) facility offsite.	Not implementable because there are no POTW facilities near the Site.	
<div></div> Technologies and/or process options screened out						



FIGURE 4-2. INITIAL SCREENING OF TECHNOLOGIES AND PROCESS OPTIONS FOR IMPLEMENTABILITY

GENERAL RESPONSE ACTION	REMEDIAL TECHNOLOGY	PROCESS OPTION	PROCESS OPTION	DESCRIPTION	SCREENING COMMENT
Groundwater and Surface Water Treatment	Physical	Separation	Gravity Separation	Separation of solids from a liquid using settling tanks, basins or other devices.	Potentially implementable in conjunction with other treatment technologies.
			Mechanical Separation	Separation of solids from a liquid using a mechanical device such as a belt press.	Potentially implementable in conjunction with other treatment technologies.
			Media Filtration	Separation of solids from a liquid typically using a granular media filter.	Potentially implementable in conjunction with other treatment technologies.
		Demineralization	Reverse Osmosis/ Ultrafiltration	Physical treatment process in which pressurized water passes through a semipermeable membrane.	Potentially implementable.
			Ion Exchange	Cation or anion exchange resins used to remove ions from water.	Potentially implementable in conjunction with other treatment technologies.
			Electrodialysis	An electric field used as the driving force for separating a liquid across a membrane.	Not applicable to inorganic contaminants found in groundwater at the site.
	Chemical	Adsorption	Activated Carbon	Granular media filled vessels used to remove organics from groundwater, surface water and air.	Not applicable to inorganic contaminants found in groundwater at the site.
			Metal Oxide	Vessels filled with zero-valent iron or activated alumina used primarily to remove arsenic.	Site-specific pilot studies indicate this technology is not effective for selenium.
		Solvent Extraction		Separates constituents from a liquid by contact with another immiscible liquid.	Not applicable to inorganic contaminants found in groundwater at the site.
		Chemical Precipitation		Chemical process where dissolved ions/salts are precipitated in the form of insoluble salts.	Potentially implementable in conjunction with other treatment technologies.
		Oxidation/Reduction		Chemical reactions used to change contaminants to less toxic compounds.	Potentially implementable in conjunction with other treatment technologies.
Ex-Situ Treatment	Biological	Biodegradation		Microorganisms used to degrade or reduce contaminants.	Potentially implementable.
	Thermal	Mechanical Evaporation		Water is mechanically heated to boiling and clean water is distilled off.	Not feasible because overburden volumes are too large.
		Wet Air Oxidation		Combustion reaction to break contaminated water and constituents down into base reaction products.	Not applicable to inorganic contaminants found in groundwater at the site.
In-Situ Treatment	Chemical	Chemical Injection		Chemical agents are injected into the impacted region of the aquifer to treat the groundwater.	Potentially hazardous byproducts, and complicated groundwater setting.
	Biological	Biodegradation		Nutrients are injected into groundwater to encourage native microorganisms to metabolize contaminants.	Not applicable to inorganic contaminants found in groundwater at the Site.
Technologies and/or process options screened out					

FIGURE 4-2. INITIAL SCREENING OF TECHNOLOGIES AND PROCESS OPTIONS FOR IMPLEMENTABILITY

GENERAL RESPONSE ACTION	REMEDIAL TECHNOLOGY	PROCESS OPTION	PROCESS OPTION	DESCRIPTION	SCREENING COMMENT	
Solids and Soil Treatment	Physical		Stabilization/Fixation	Excavated solids slurried with stabilization/ fixation agents to reduce contaminant solubility and mobility.	Potentially hazardous byproducts. Not feasible because overburden volumes are too large.	
			Dewatering	Separation of liquids from solids by various methods.	Not applicable for large volumes of overburden material.	
			Separation	Soils are slurried, and passed through a gravity separation process to extract inorganics.	Site conditions not ideal for this technology.	
	Thermal		Incineration	Energy applied to solids to combust organic constituents.	Not applicable to inorganic contaminants found in groundwater at the site.	
			Desorption	Volatile compounds are separated or recovered from a solid or liquid matrix.	Not applicable to inorganic contaminants found in groundwater at the site.	
	Chemical		Oxidation/Reduction	Chemical reactions used to change contaminants to less toxic compounds.	Not feasible because overburden volumes are too large.	
			Hydrolysis	Contaminants react with hydrolyzing agents resulting in decomposition of the chemical compounds.	Potentially hazardous byproducts.	
			Extraction	Multistage, intense scrubbing circuit used to wash and separate contaminated solids.	Not applicable to inorganic contaminants found in groundwater at the site.	
Ex-Situ Treatment	Physical/Chemical		Stabilization/Fixation	Machinery is used to directly inject stabilizing agents, such as cement, into the soil.	Potentially hazardous byproducts.	
			Aeration	Aeration of soils is typically achieved by soil vapor extraction systems.	Not applicable to inorganic contaminants found in groundwater at the site.	
	Thermal		Vitrification	Soils are electrically heated and fused into a stable, glass-like block.	Not feasible because overburden volumes are too large.	
			Desorption	Volatile compounds are separated or recovered from a solid or liquid matrix.	Not applicable to inorganic contaminants found in groundwater at the site.	
	Biological		Enhanced Biodegradation	Nutrients are injected into soils to encourage native microorganisms to metabolize contaminants.	Not applicable to inorganic contaminants found in groundwater at the site.	
			Phytoremediation	Plants are used to extract and concentrate some organic constituents and metals/metalloids from soils.	Not applicable due to the presence of plant eating livestock and wildlife at the site.	
	Technologies and/or process options screened out					



FIGURE 4-3. EVALUATION OF PROCESS OPTIONS FOR EFFECTIVENESS, IMPLEMENTABILITY, AND RELATIVE COST

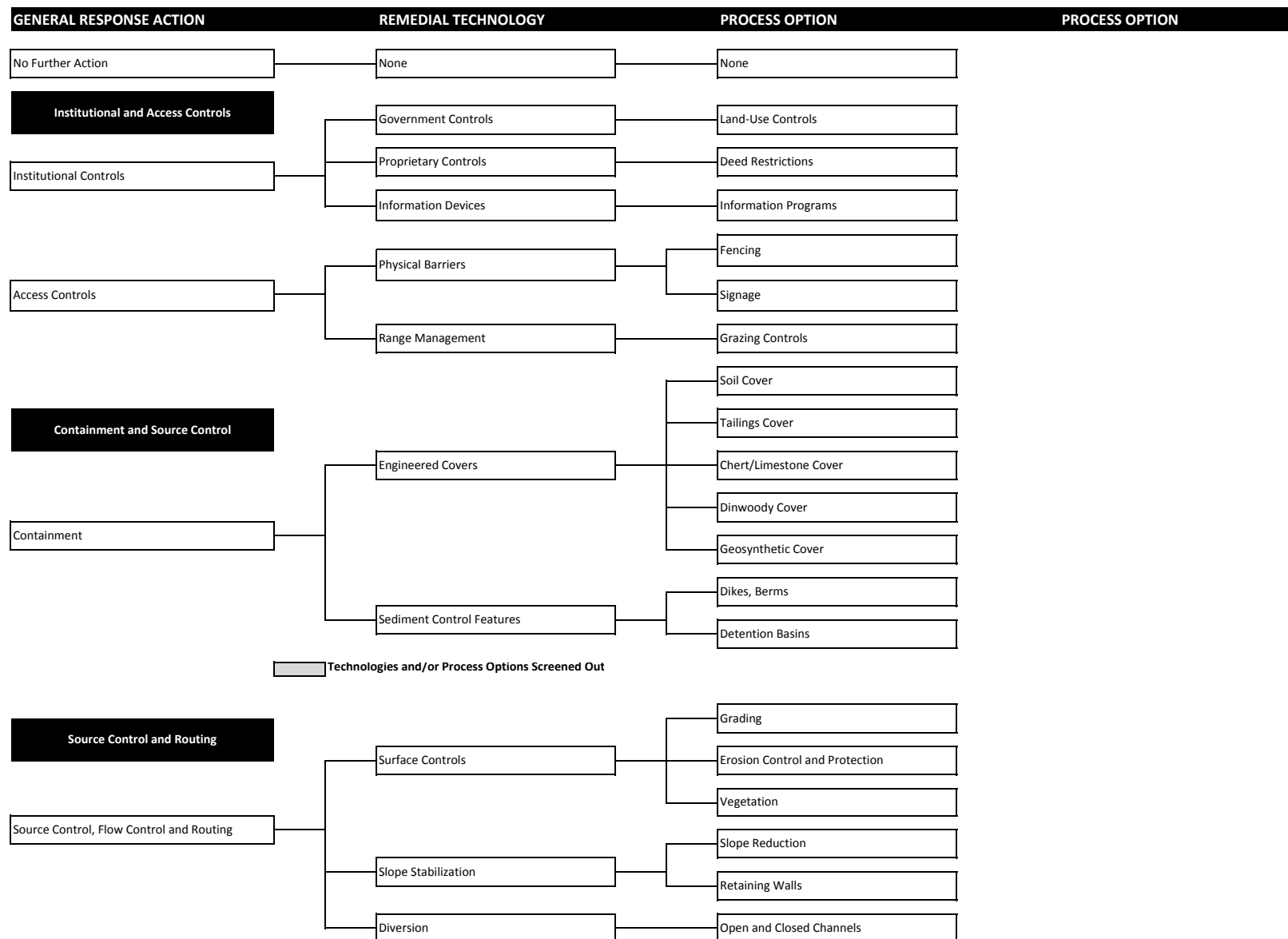


FIGURE 4-3. EVALUATION OF PROCESS OPTIONS FOR EFFECTIVENESS, IMPLEMENTABILITY, AND RELATIVE COST

